

**April 8, 2003**

RE: **HARRIS KAYOT, INC. 003-17105-00177**  
TO: Interested Parties / Applicant  
  
FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

**Notice of Decision: Approval - Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

*(over)*

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
Administrator, Christine Todd Whitman  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVPMOD.wpd 8/21/02



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-

6015

(317) 232-8603  
(800) 451-6027  
[www.state.in.us/idem](http://www.state.in.us/idem)

**April 8, 2003**

Mr. James Poiry, President  
Harris Kayot, Inc.  
2801 West State Street  
Ft. Wayne, Indiana 46808

Re: 003-17105-00177  
Significant Permit Modification to:  
Part 70 permit No.:T003-7743-00177

Dear Mr. Poiry:

Harris Kayot, Inc., was issued a permit on March 22, 2002, for a fiberglass molds and plastic/vacuum formed items manufacturing operation. A letter requesting changes to this permit was received on September 3, 2002. Pursuant to the provisions of 326 IAC 2-7-12, a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

(a) The modification consists of the addition of the following equipment:

- (1) One (1) HVLP spray gun (identified as G17) used for gelcoat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.
- (2) Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20), used to apply resin, installed in 2003, with particulate matter (PM) controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.
- (3) Natural gas-fired combustion sources with heat input equal to less than ten (10) million British thermal units per hour, including four (4) space heaters each with a maximum heat input capacity of 500,000 Btu per hour.

In addition to the new emission units, the source has requested the process weight rate and particulate emission rate for the fiberglass grinding and smoothing operation be corrected to reflect the maximum weight that can be processed by this facility. No new equipment will be added to the grinding and smoothing operation.

All other conditions of the permit shall remain unchanged and in effect. The entire permit is enclosed.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Amanda Baynham, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7910 to speak directly to Ms. Baynham. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,  
**Original signed by**  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

- Technical Support Document, Permit  
ERG/AAB

cc: File - Allen County  
Allen County Health Department  
Air Compliance Section Inspector - Jennifer Dorn  
Compliance Data Section - Karen Nowak  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner



Frank O. Dannon  
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## PART 70 OPERATING PERMIT and ENHANCED NEW SOURCE REVIEW

### OFFICE OF AIR QUALITY

**Harris Kayot, Inc.  
2801 West State Boulevard  
Fort Wayne, Indiana 46808**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7743-00177	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Quality	Issuance Date: September 23, 1998  Expiration Date: September 23, 2003

First Minor Permit Revision No.: 003-10574-00177, issued march 30, 1999  
First Reopening No.: R003-13137-00177, issued November 29, 2001

First Significant Permit Modification No.: 003-17105-00177	Pages Affected: 5, 26-33, 43
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Issued by: <b>Original signed by</b> Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>April 8, 2003</b>
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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary fiberglass boat fabrication operation.

Responsible Official:	Mr. Baron Biedenweg
Source Address:	2801 West State Boulevard, Fort Wayne, Indiana 46808
Mailing Address:	2801 West State Boulevard, Fort Wayne, Indiana 46808
SIC Code:	3732
County Location:	Allen
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

(a) Gelcoat and molding application facilities consisting of the following emission units:

- (1) One (1) gelcoat application booth consisting of one (1) HVLP gun G1, with particulate matter (PM) overspray controlled by dry filters, exhausting through Stack E14 (formerly E2), with a maximum throughput of 0.34 boats per hour.
- (2) One (1) HVLP spray gun (identified as G17), used for gel coat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.
- (3) Two (2) molding operations consisting of three (3) chop guns, identified as G2-G4, and a hand-lay up area exhausting through Stacks E12 and E13 (formerly E4 and E3, respectively), with a maximum throughput of 0.17 boats per gun per year hour. PM overspray is controlled by dry filters.
- (4) Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20), used to apply resin, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.

The spray guns installed in 2003 may be used either on the existing gelcoat and molding line or to set up a separate parallel gelcoat and molding line.

- (b) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, with PM emissions controlled by a baghouse exhausting through Stack E15 (formerly E5).

- (c) Woodworking operations including various saws and routers with PM emissions controlled by a baghouse exhausting through Stack E2 and a movable bag filter.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million British thermal units per hour. (7.0 MM Btu/hr boiler)
- (b) Welding operations venting through Stacks E3-E6 and consisting of nine (9) metal inert gas (MIG) stations and four (4) tungsten inert gas (TIG) stations consuming no more than 10.0 pounds of wire per hour, combined. Particulate matter 10 microns (PM-10) emissions less than five (5) pounds per hour and twenty-five (25) pounds per day.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs. (twelve (12) glue guns, G5-G16, exhausting through Stack GV7)
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or for
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision; and
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
- (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

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B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
- (1) The applicable requirements are included and specifically identified in this permit;  
or



- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

---

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

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**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

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**B.23 Construction Permit Requirement [326 IAC 2]**

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

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**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

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**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

---

**B.27 Enhanced New Source Review [326 IAC 2]**

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**

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Notwithstanding the conditions of this permit specifying practices for applicable requirements, other credible evidence may also be used to establish compliance or noncompliance with applicable requirements.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 Minor Source [326 IAC 2-2]

- (a) The total source potential to emit of volatile organic compounds are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2 and 40 CFR 52.21, before such change may occur.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

#### C.7 Operation of Equipment [326 IAC 2-7-6(6)]



All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

---

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## Testing Requirements [326 IAC 2-7-6(1)]

### C.9 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

### C.10 Compliance Schedule [326 IAC 2-7-6(3)]

---

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements;
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such requirements that become effective during the term of this permit.

### C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**C.14 Pressure Gauge Specifications**

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Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]  
[326 IAC 2-7-19 (e)]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements and be used for the purpose of a Part 70 fee assessment:
  - (1) Indicate actual emissions of criteria pollutants from the source;
  - (2) Indicate actual emissions of other regulated pollutants from the source.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by

any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

**C.19 Monitoring Data Availability**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:

- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## Stratospheric Ozone Protection

### C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) Gelcoat and molding application facilities consisting of the following emission units:
  - (1) One (1) gelcoat application booth consisting of one (1) HVLP gun G1, with particulate matter (PM) overspray controlled by dry filters, exhausting through Stack E14 (formerly E2), with a maximum throughput of 0.34 boats per hour.
  - (2) One (1) HVLP spray gun (identified as G17), used for gel coat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.
  - (3) Two (2) molding operations consisting of three (3) chop guns, identified as G2-G4, and a hand-lay up area exhausting through Stacks E12 and E13 (formerly E4 and E3, respectively), with a maximum throughput of 0.17 boats per gun per year hour. PM overspray is controlled by dry filters.
  - (4) Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20), used to apply resin, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.

The spray guns installed in 2003 may be used either on the existing gelcoat and molding line or to set up a separate parallel gelcoat and molding line.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

## Emission Limitations and Standards [326 IAC 2-7-5(1)]

### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The emissions of volatile organic compounds from the gelcoat and molding operations shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors For Open Molding of Composites, Composites Fabricators Association, April



1999." Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to these gelcoat and molding operations.

#### D.1.2 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) emissions from the gel coat and molding operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.3 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]

Pursuant to 326 IAC 20-25-3, the owners or operators of the gelcoat and molding operations shall comply with the following conditions:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Watercraft Products	HAP Monomer Content (Weight Percent)
<b><u>Resin Manual or Mechanical Application</u></b>	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant filled (\$35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
<b><u>Gel Coat Application</u></b>	
Production - Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

\* - Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category  
 $E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.  
 $Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls

Units: *mass = tons*  
*emission factor = lbs of monomer per ton of resin or gel coat*  
*emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (5) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (6) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (7) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
  - (1) Nonatomized application technology.
  - (2) Air-assisted airless.
  - (3) Airless.
  - (4) High volume, low pressure (HVLP).
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
  - (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
  - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
  - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

**D.1.4 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]**

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Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
  - (1) All production and tooling resins that contain HAPs.

- (2) All production and tooling gel coats that contain HAPs.
- (3) Waste resins and gel coats that contain HAPs.
- (4) Cleaning materials, including waste cleaning materials.
- (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

#### D.1.5 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The owner or operator shall maintain the following training records on site and available for inspection and review:
  - (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.8 Hazardous Air Pollutants (HAP) for Reinforced Plastics Composites Fabrication [326 IAC 20-25]**

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Pursuant to 326 IAC 20-25, compliance with the HAP monomer content limitations in Condition D.1.3 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.
- (b) The manufacturer's material safety data sheet.
- (c) Sampling and analysis, using any of the following test methods, as applicable:
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coat to require that the procedure be performed on uncatalyzed resin or gel coat samples.
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.
- (d) An alternative method that has been approved by IDEM, OAQ.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.9 Particulate [326 IAC 6-3-2(d)]**

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Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gelcoat and molding operations shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.

**D.1.10 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the stacks (EU12, EU13, EU14, E31, E32, E33, and E34) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.

The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC allowable usage level established in Condition D.1.1.
  - (1) The amount and VOC content of each gelcoat and resin used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) The total VOC usage for each month; and
  - (3) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

##### **D.1.12 Record Keeping Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]**

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- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include by are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following records:
  - (1) A copy of the current training program.

- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

#### D.1.14 Reporting Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]

If monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.3 are used, the Permittee shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (b) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, with PM emissions controlled by a baghouse exhausting through Stack E15 (formerly E5).
- (c) Woodworking operations including various saws and routers with PM emissions controlled by a baghouse exhausting through Stack E2 and a movable bag filter.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the allowable particulate emission rate from the grinding and smoothing facilities shall not exceed 2.70 pounds per hour when operating at a process weight rate of 1,075 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.2 Particulate [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the allowable PM emission rate from the woodworking facilities shall not exceed 1.57 pounds per hour when operating at a process weight rate of 480.0 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

### Compliance Determination Requirements

#### D.2.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.



Harris Kayot, Inc.  
Fort Wayne, Indiana  
Permit Reviewer: Holly M. Stockrahm

First Significant Permit Modification: 003-17105-00177  
Modified by: ERG/AAB

Page 37 of 47  
OP No. T003-7743-00177

## **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.2.5 Visible Emissions Notations**

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- (a) Daily visible emission notations of the grinding and smoothing operation stack exhaust and the woodworking baghouse exhausting at Stack E2 shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

### **D.2.6 Parametric Monitoring**

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The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the fiberglass grinding and smoothing operation, at least once daily when the grinding and smoothing facilities are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2 to 7 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

### **D.2.7 Baghouse Inspections**

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An inspection shall be performed each calendar quarter of all bags controlling the woodworking operations. All defective bags shall be replaced.

### **D.2.8 Broken Bag or Failure Detection**

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In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced.
- (b) Based upon the findings of the inspection, any additional corrective actions will be devised within eight (8) hours of discovery and will include a timetable for completion.

**Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.9 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.5, the Permittee shall maintain records of daily visible emission notations of the fiberglass grinding and smoothing operation stack exhaust and the woodworking baghouse exhausting at Stack E2.
- (b) To document compliance with Condition D.2.6, the Permittee shall maintain the following:
  - (1) Daily records of the following operational parameters during normal operation:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle: frequency and differential pressure immediately following the cleaning cycle.
  - (2) Documentation of all corrective actions implemented, per event.
  - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
  - (4) Quality Assurance/Quality Control (QA/QC) procedures.
  - (5) Operator standard operating procedures (SOP).
  - (6) Manufacturer's specifications or its equivalent.
  - (7) Equipment "troubleshooting" contingency plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)] INSIGNIFICANT ACTIVITIES

- (a) One (1) natural gas fired boiler with a maximum heat input rate of 7.0 million British thermal units per hour, exhausting through Stack E1.
- (b) Welding operations venting through Stacks E3-E6 and consisting of nine (9) metal inert gas (MIG) stations and four (4) tungsten inert gas (TIG) stations consuming no more than 10.0 pounds of wire per hour, combined.
- (c) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs. (twelve (12) HVLP glue guns, G5-G16, exhausting through Stack GV7)
- (d) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from the 7.0 million British thermal units per hour boiler shall be limited to 0.6 pounds per MM BTU heat input.

#### D.3.2 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the welding stations shall not exceed 0.12 pounds per hour when operating at a process weight rate of 10.0 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.3.3 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the water based adhesives spray guns shall not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

#### D.3.4 Degreaser [326 IAC 8-3-5]

- (1) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kilopascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
  - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kilopascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
  - (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

- (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### **Compliance Determination Requirement**

#### **D.3.5 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility (the 7.0 million British thermal units per hour boiler, the welding facilities, or the glue application guns) by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limits specified in Conditions D.3.1, D.3.2, and D.3.3 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Harris Kayot, Inc.  
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Part 70 Permit No.: T003-7743-00177

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE DATA SECTION**  
**P.O. Box 6015**  
**100 North Senate Avenue**  
**Indianapolis, Indiana 46206-6015**  
**Phone: 317-233-5674**  
**Fax: 317-233-5967**

**PART 70 OPERATING PERMIT**  
**EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Harris Kayot, Inc.  
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Part 70 Permit No.: T003-7743-00177

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9 1.** This is an emergency as defined in 326 IAC 2-7-1(12)  
c The Permittee must notify the Office of Air Quality (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
c The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2.** This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
c The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

**Page 2 of 2**



Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?      Y      N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Harris Kayot, Inc.  
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Part 70 Permit No.: T003-7743-00177

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly (or semi-annually). Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify zero in the column marked "No Deviations". in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD. LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**Compliance Branch**

**Part 70 Quarterly Report**

Source Name: Harris Kayot, Inc.  
Source Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Mailing Address: 2801 West State Boulevard, Fort Wayne, Indiana 46808  
Part 70 Permit No.: T003-7743-00177  
Facility: Gelcoat and molding operations  
Parameter: Volatile Organic Compounds (VOC)  
Limit: Twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Months Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

April 8, 2003

## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Part 70 Significant Source Modification and Part 70 Significant Permit Modification

#### Source Background and Description

Source Name:	Harris Kayot, Inc.
Source Location:	2801 West State Street, Ft. Wayne, Indiana 46808
County:	Allen
SIC Code:	3732
Operation Permit No.:	T003-7743-00177
Operation Permit Issuance Date:	September 23, 1998
Significant Source Modification No.:	003-16250-00177
Significant Permit Modification No.:	003-17105-00177
Permit Reviewer:	ERG/AAB

The Office of Air Quality (OAQ) has reviewed a modification application from Harris Kayot, Inc. relating to the construction of the following emission units and pollution control devices:

- (a) Gelcoat and molding application facilities consisting of the following emission units:
  - (2) One (1) HVLP spray gun (identified as G17), used for gel coat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.
  - (4) Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20), used to apply resin, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.

The spray guns installed in 2003 may be used either on the existing gelcoat and molding line or to set up a separate parallel gelcoat and molding line.

The source also proposes to install four natural gas-fired space heaters, each with a maximum heat input capacity of 500,000 Btu per hour. Since these are insignificant emission units for which there are no specific requirements, they have not been listed in Condition A.3 of the permit.

In addition to the new gelcoat and molding guns, the source has requested the pound per hour process weight rate and the particulate emission rate for the existing fiberglass grinding and smoothing operation ) (Condition D.2.1) be corrected. The current permit states that the process weight rate is 104.7 pound per hour. The source has indicated that the correct process weight is 1,075 pounds per hour. Note that no additional equipment has been added to this facility.

## History

On October 21, 2002, Harris Kayot, Inc., submitted an application to the OAQ requesting to add additional gelcoat and chop spray guns to their existing plant. The new guns will be used on the existing gelcoat and molding line to make it easier to switch between different colors. The source may also use the new guns to set up another, parallel gelcoat and molding line. Harris Kayot, Inc., was issued a Part 70 permit on September 23, 1998.

## Enforcement Issue

There are no enforcement actions pending.

## Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
E31	Gelcoat	21	3	8,000	Ambient
E32	Molding	21	3	8,000	Ambient
E33	Molding	21	3	8,000	Ambient
E34	Molding	21	3	8,000	Ambient

## Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification and Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 21, 2002. Additional information was received on November 14, 2002, December 16, 2002, and December 31, 2002.

## Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (Appendix A, pages 1 through 5).

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls and waste disposal. Control equipment and solvent recovery is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.07
PM-10	0.07
SO <sub>2</sub>	0.005
VOC	114.0
CO	0.74
NO <sub>x</sub>	0.90

HAP's	Potential To Emit (tons/year)
Styrene	75.6
Methyl methacrylate	12.7
Methyl Ethyl Ketone	0.52
TOTAL	88.8

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification and Significant Permit Modification. This source modification is being performed pursuant to 326 IAC 2-7-10.5(f)(6), because the proposed modification has a potential to emit styrene that is greater than 10 tons per year. The permit modification is being performed pursuant to 326 IAC 2-7-12(d)(1).

### County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	Attainment
SO <sub>2</sub>	Attainment
NO <sub>x</sub>	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	106
PM-10	106
SO <sub>2</sub>	0.02
VOC	less than 25
CO	0.7
NO <sub>x</sub>	3.3

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one (1) of the twenty-eight (28) listed source categories.
- (b) These emissions are based upon the information provided in the technical support document for the source's current Part 70 Permit (T003-7743-00177, issued September 23, 1998).

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAP
Expanded gelcoat and molding operation	0	0	0	25	0	0	177.6*
New space heaters	0.07	0.07	0.005	0.05	0.74	0.9	Negligible
Existing woodworking, welding, grinding operations, and space heaters	212	106.0	0.02	0.2	0.7	3.3	Negligible
<b>TOTAL</b>	<b>212.1</b>	<b>106.1</b>	<b>0.025</b>	<b>25.25</b>	<b>1.44</b>	<b>4.2</b>	<b>177.6*</b>

\*The potential to emit hazardous air pollutants (HAPs) from the gelcoat and molding activities is 185.4 tons per year for total combined HAPs. Since the VOC emissions from these units are limited to 25 tons per year, the HAP emissions will be significantly less than the potential to emit stated in this table.

This modification to an existing minor stationary source is not major because the increase is less than PSD major source levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

#### Federal Rule Applicability

- (a) This significant modification does not involve a pollutant-specific emissions unit:
- (1) with the potential to emit before controls equal to or greater than one hundred (100) tons per year, and
  - (2) that is subject to an emission limit and has a control device that is necessary to meet that limit.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.
- (d) As an existing major source of hazardous air pollutants (HAPs), this fiberglass boat building plant is subject to the requirements of 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing. This NESHAP is applicable to all major sources of HAP that were in existence on August 22, 2001. This source is required to comply with this subpart by August 23, 2004.

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration)**

This source was constructed in 1992, is not in one of the twenty-eight listed source categories, and was considered a minor source under 326 IAC 2-2 (PSD) and 40 CFR 52.21. The potential to emit for the entire source after this modification will be less than the 250 tons per year PSD thresholds. Since the source will remain a minor source under PSD after this modification, it is not subject to the provisions of 326 IAC 2-2 and 40 CFR 52.21.

##### **326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)**

A source that constructs or reconstructs a major source of hazardous air pollutants (HAPs) after July 27, 1997 is subject to the requirements of 326 IAC 2-4.1. Currently, Harris Kayot, Inc. manufactures fiberglass boats using existing emission units constructed prior to July 27, 1997. The process includes gel coat application, resin application, grinding and welding operations, woodworking, degreasing, and adhesive application. Although the potential HAP emissions are greater than the major thresholds (i.e., greater than 10 tons per year for a single HAP and greater than 25 tons per year for a combination of HAPs), the proposed modification does not trigger 326 IAC 2-4.1 because the source is already subject to the requirements of 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing, which was promulgated on August 22, 2001. This NESHAP applies to all sources that are involved in the manufacture fiberglass boats and were existing major sources of HAPs as of August 22, 2000.

#### **State Rule Applicability - New Gelcoat and Molding Operations**

##### **326 IAC 6-3-2 (Particulate Emission Limitation)**

On June 12, 2002, revisions to the 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations), which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

Pursuant to 40 CFR 52 Subpart P, the particulate emissions from the gelcoat and molding operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:



$$E = 4.10 P^{0.67} \quad \text{where} \quad \begin{array}{l} E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour} \end{array}$$

Under the rule revision, particulate from the surface coating operations shall be controlled by dry particulate filter or an equivalent control device, and the Permittee shall operate the control device in accordance with the manufacturer's specifications.

**326 IAC 8-1-6 (New Facilities - General Reduction Requirements)**

Since the new gelcoat and resin guns will be used in the existing gelcoat and molding line, the gelcoat and molding operation is considered as one facility under 326 IAC 8-1-6. The expanded gelcoat and molding facility would be subject to 326 IAC 8-1-6 because the units are constructed after the applicability date of January 1, 1980 and have potential emissions of volatile organic compounds (VOC) that are greater than twenty-five (25) tons per year. However, Harris Kayot, Inc. has agreed to limit the combined VOC emissions from these facilities to less than twenty-five (25) tons per twelve (12) consecutive month period. The following limitation has been included in the proposed permit:

The emissions of volatile organic compounds from the gelcoat and molding operations shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors for Open Molding of Composites," Composites Fabricators Association, April 1999. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable.

**326 IAC 20-25 (Emissions from Reinforced Plastics Composites Fabricating Emission Units)**

The new and existing gelcoat and molding facilities are subject to 326 IAC 20-25 because:

1. They have a potential to emit 10 tons per year of any hazardous air pollutant (HAP) or 25 tons per year of any combination of HAPs and that manufacture;
2. They manufacture fiberglass boats; and
3. They have actual emissions of styrene equal to or greater than 3 tons per year.

The following conditions have been included in the proposed permit:

Pursuant to 326 IAC 20-25-3, the gelcoat and molding facilities shall comply with the following conditions:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

<b>Watercraft Products</b>	<b>HAP Monomer Content (Weight Percent)</b>
<b><u>Resin Manual or Mechanical Application</u></b>	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Shrinkage Controlled	52

Watercraft Products	HAP Monomer Content (Weight Percent)
<b><u>Resin Manual or Mechanical Application</u></b>	
Tooling	43*
<b><u>Gel Coat Application</u></b>	
Production - Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

\* - Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application category listed in subsection (b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gel coats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resin and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

For Averaging within a category:

$$Em_A \leq (M_R * E_a)$$

Where:

$M_R$  = Total monthly mass of material within each category  
 $E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category.  
 $Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls  
*Units: mass = tons*  
*emission factor = lbs of monomer per ton of resin or gel coat*  
*emissions = lbs of monomer*

Note: Fillers may not be included when averaging.

Where:

$M_R$  = Total monthly mass of material within each category (tons).  
 $E_a$  = Emission factor for each material based on allowable monomer content and allowable application method for each category (lbs of monomer per ton of resin or gel coat applied).

$Em_A$  = Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls (lbs of monomer).

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, speciality product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (1) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (2) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.
- (3) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

(c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:

- (1) Nonatomized application technology.
- (2) Air-assisted airless.
- (3) Airless.
- (4) High volume, low pressure (HVLP).
- (5) Equivalent emission reduction technologies to subdivisions (2) through (4).

(d) The following cleaning operation standards for resin and gel coat application equipment shall apply:

- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
- (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
- (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (1) Nonatomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (2) Except for mixing containers as described in (g), HAP containing materials shall be kept in a closed container when not in use.
- (3) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.
- (4) Solvent collection containers shall be kept closed when not in use.
- (5) Clean-up rags with solvent shall be stored in closed containers.
- (6) Closed containers shall be used for the storage of the followings:
  - (A) All production and tooling resins that contain HAPs.
  - (B) All production and tooling gel coats that contain HAPs.
  - (C) Waste resins and gel coats that contain HAPs.
  - (D) Cleaning materials, including waste cleaning materials.
  - (E) Other materials that contain HAPs.
- (7) All resins and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All new personnel shall be trained within fifteen (15) days of hiring.

- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided by the new employer.
- (e) If the result of an evaluation show that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.
- (g) The Permittee shall maintain the following training records on site and available for inspection and review:
  - (1) A copy of the current training program.
  - (2) A list of current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.

### **State Rule Applicability - Space Heaters**

There are no State or Federal rules specifically applicable to these units.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Compliance monitoring requirements applicable to this modification are as follows:

The gelcoat and molding operations have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.
- (b) Monthly inspections shall be performed of the particulate emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

These monitoring conditions are necessary because the dry filters used to control particulate emissions from these emission units because they must operate properly to ensure compliance with 40 CFR 52, Subpart P and 326 IAC 2-7 (Part 70).

## Proposed Changes

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) **Gelcoat and molding application facilities consisting of the following emission units:**
  - (1) One (1) gelcoat application booth consisting of one (1) HVLP gun G1, with particulate matter (PM) overspray controlled by dry filters, exhausting through Stack E14 (formerly E2), with a maximum throughput of 0.34 boats per hour.
  - (2) **One (1) HVLP spray gun (identified as G17), used for gel coat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.**
  - (23) Two (2) molding operations consisting of three (3) chop guns, identified as G2-G4, and a hand-lay up area exhausting through Stacks E12 and E13 (formerly E4 and E3, respectively), with a maximum throughput of 0.17 boats per gun per hour. PM overspray is controlled by dry filters.
  - (4) **Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20) used to apply resin, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.**

**The spray guns installed in 2003 may be used either on the existing gelcoat and molding line or to set up a separate parallel gelcoat and molding line.**

- (3b) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, with PM emissions controlled by a baghouse exhausting through Stack E15 (formerly E5).

- (4c) Woodworking operations including various saws and routers with PM emissions controlled by a baghouse exhausting through Stack E2 and a movable bag filter.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

**(a) Gelcoat and molding application facilities consisting of the following emission units:**

- (1) One (1) gelcoat application booth consisting of one (1) HVLP gun G1, with particulate matter (PM) overspray controlled by dry filters, exhausting through Stack E14 (formerly E2), with a maximum throughput of 0.34 boats per hour.
- (2) **One (1) HVLP spray gun (identified as G17), used for gel coat application, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting through stack E31. The maximum throughput capacity is 0.34 boats per hour.**
- (23) Two (2) molding operations consisting of three (3) chop guns, identified as G2-G4, and a hand-lay up area exhausting through Stacks E12 and E13 (formerly E4 and E3, respectively), with a maximum throughput of 0.17 boats per gun per hour. PM overspray is controlled by dry filters.
- (4) **Three (3) mechanical, non-atomized chop guns (identified as G18, G19, and G20) used to apply resin, installed in 2003, with particulate matter (PM) overspray controlled by dry filters, exhausting to stacks E32, E33, and E34. The maximum throughput capacity is 0.17 boats per gun per hour.**

**The spray guns installed in 2003 may be used either on the existing gelcoat and molding line or to set up a separate parallel gelcoat and molding line.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

~~Pursuant to 326 IAC 8-1-6 (General reduction requirements for new facilities), any change or modification which may increase the potential VOC emissions to 25 tons per year or more from the gelcoat application booth and molding operations must be approved by the Office of Air Quality (OAM) before such change may occur.~~

**The emissions of volatile organic compounds from the gelcoat and molding operations shall not exceed twenty-five (25) tons per twelve (12) consecutive month period, with compliance determined at the end of each month. VOC emissions from the gelcoats and resins shall be calculated by multiplying the usage of each gelcoat and resin by the emission factor provided by the "Unified Emission Factors For Open Molding of Composites, Composites Fabricators Association, April 1999." Compliance with this limit makes 326 IAC 8-1-6 (New Facilities - General Reduction Requirements) not applicable to these gelcoat and molding operations.**

#### D.1.2 Particulate Matter (PM) ~~[326 IAC 6-3-2(e)]~~ [40 CFR 52, Subpart P]

~~The PM from the application of gelcoat and the molding operations shall not exceed the pound per hour emission rate established as E in the following formula: —~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation: —~~



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$$E = 4.10 P^{0.67}$$


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where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

Pursuant to 40 CFR 52, Subpart P, the particulate matter (PM) emissions from the gel coat and molding operations shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and  
P = process weight rate in tons per hour

#### **D.1.3 Emissions Standards for Reinforced Plastics Composites Fabricating [326 IAC 20-25-3]**

Pursuant to 326 IAC 20-25-3, the owners or operators of the gelcoat and molding operations shall comply with the following conditions:

- (a) The total HAP monomer content of the following materials shall be limited based on the application method used and the products produced as specified in the following table:

Watercraft Products	HAP Monomer Content (Weight Percent)
<b><u>Resin Manual or Mechanical Application</u></b>	
Production-Specialty Products	48*
Production-Noncorrosion Resistant Unfilled	35*
Production-Noncorrosion Resistant Filled (\$35% by weight)	38
Shrinkage Controlled	52
Tooling	43*
<b><u>Gel Coat Application</u></b>	
Production - Pigmented and Base Coat Gel Coat	34
Clear Production and Tooling	48

\* - Categories that must use mechanical nonatomized application technology or manual application as stated in subsection (c).

Compliance with these HAP monomer content limits shall be demonstrated on a monthly basis. If all of the resins and gel coats used during a month meet the specified HAP monomer content limits, then maintaining records of content and usage as specified under Condition D.1.12 is sufficient for demonstrating compliance with the HAP monomer content limits.

Compliance with the limitations contained in this condition may be demonstrated using monthly emission averaging within each resin or gel coat application

category listed in subsection(b) by the use of resins or gel coats with HAP monomer contents lower than the limits specified, and/or additional emission reduction techniques approved by IDEM, OAQ.

Examples of emission reduction techniques include, but are not limited to, using nonatomized application to apply resins or gelcoats within a category that does not require nonatomized application, lower monomer content resins and gel coats, vapor suppression, vacuum bagging, or installing a control device. This is allowed to meet the HAP monomer content limits for resins and gel coats within each category, and shall be calculated on an equivalent emissions mass basis monthly to demonstrate compliance as shown below:

<b>For Averaging within a category:</b>	
$Em_A \leq (M_R * E_a)$	
<b>Where:</b>	
$M_R$ =	Total monthly mass of material within each category
$E_a$ =	Emission factor for each material based on allowable monomer content and allowable application method for each category.
$Em_A$ =	Actual monthly emissions from all materials used within a category based on material specific emission factors, emission reduction techniques and emission controls
<i>Units: mass = tons</i>	
<i>emission factor = lbs of monomer per ton of resin or gel coat</i>	
<i>emissions = lbs of monomer</i>	
<b>Note: Fillers may not be included when averaging.</b>	

(b) The following categories of materials in subsection (a) shall be applied using mechanical nonatomized application technology or manual application:

- (1) Production noncorrosion resistant, unfilled resins from all sources.
- (2) Production, specialty product resins from all sources.
- (3) Tooling resins used in the manufacture of watercraft.
- (4) Production resin used for Class I flame and smoke products.

Nonatomized application equipment means the devices where resin or gel coat material does any of the following:

- (5) Flows from the applicator, in a steady state in a observable coherent flow, without droplets, for a minimum distance of three (3) inches from the applicator orifices such as flow coaters, flow choppers, and fluid impingement equipment.
- (6) Is mechanically dispensed within or on to a paint roller applicator such as pressure fed rollers.

- (7) Is deposited on fiber reinforcement moving through a resin or gel coat bath such as resin impregnators.

Nonatomized spray application technology includes flow coaters, flow choppers, pressure-fed rollers, fluid impingement, or other non-spray applications of a design and specifications approved by IDEM, OAQ.

Filled resins are resins containing greater than or equal to thirty-five percent (35%) by weight inert filler material, such as silica micro-spheres or micro-balloons, added to alter the density or other physical properties of the resin. The term "inert filler" does not include pigments.

- (c) Unless specified in subsection (b), gel coat application and mechanical application of resins shall be by any of the following spray technologies:
- (1) Nonatomized application technology.
  - (2) Air-assisted airless.
  - (3) Airless.
  - (4) High volume, low pressure (HVLP).
  - (5) Equivalent emission reduction technologies to subdivisions (2) through (4).
- (d) The following cleaning operation standards for resin and gel coat application equipment shall apply:
- (1) For routine flushing of resin and gel coat application equipment such as spray guns, flow coaters, brushes, rollers, and squeegees, a cleaning solvent shall contain no HAPs. This emission standard does not apply to solvents used for removing cured resin or gel coat from application equipment.
  - (2) A source must store HAP containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must be in place at all times, except when equipment is placed in or removed from the container.
  - (3) Recycled cleaning solvents that contain less than or equal to five percent (5%) HAP by weight are considered to contain no HAP for the purposes of this subsection.

**D.1.4 Work Practice Standards for Reinforced Plastic Composites Fabrication [326 IAC 20-25-4]**

Pursuant to 326 IAC 20-25-4, the following work practice standards shall be implemented:

- (a) Non-atomizing spray equipment shall not be operated at pressures that atomize the material during the application process.
- (b) Except for mixing containers as described in item (g), HAP containing materials shall be kept in a closed container when not in use.
- (c) Solvents sprayed during cleanup and resin changes shall be directed into solvent collection containers.

- (d) Solvent collection containers shall be kept closed when not in use.
- (e) Clean-up rags with solvent shall be stored in closed containers.
- (f) Closed containers shall be used for the storage of the following:
  - (1) All production and tooling resins that contain HAPs.
  - (2) All production and tooling gel coats that contain HAPs.
  - (3) Waste resins and gel coats that contain HAPs.
  - (4) Cleaning materials, including waste cleaning materials.
  - (5) Other materials that contain HAPs.
- (g) All resin and gel coat mixing containers with a capacity equal to or greater than fifty-five (55) gallons must have a cover with no visible gaps in place at all times except when material is being added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

**D.1.5 Operator Training for Reinforced Plastic Composites Fabrication [326 IAC 20-25-8]**

Pursuant to 326 IAC 20-25-8, all new and existing personnel, including contract personnel, who are involved in resin and gel coat spraying and spray-like applications (for example, those applications that could result in excess emissions if performed improperly) shall be trained according to the following schedule:

- (a) All personnel hired after March 7, 2001 shall be trained within fifteen (15) days of hiring.
- (b) All personnel hired before March 7, 2001 shall be trained or evaluated by a supervisor within thirty (30) days of the start of operation.
- (c) To ensure training goals listed in subsection (b) are maintained, all personnel shall be given refresher training annually.
- (d) Personnel who have been trained by another owner or operator subject to 326 IAC 20-25 are exempt from subdivision (a) if written documentation that the employee's training is current is provided to the new employer.
- (e) If the result of an evaluation shows that training is needed, such training shall occur within fifteen (15) days of the evaluation.
- (f) The lesson plans shall cover, for the initial and refresher training, at a minimum, all of the following topics:
  - (1) Appropriate application techniques.
  - (2) Appropriate equipment cleaning procedures.
  - (3) Appropriate equipment setup and adjustment to minimize material usage and overspray.

**(g) The owner or operator shall maintain the following training records on site and available for inspection and review:**

- (1) A copy of the current training program.**
- (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date of the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.**

**D.1.36 Preventive Maintenance Plan [326 IAC 2-7-4(c)(9)]**

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A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.47 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.1.8 Hazardous Air Pollutants (HAP) for Reinforced Plastics Composites Fabrication [326 IAC 20-25]**

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Pursuant to 326 IAC 20-25, compliance with the HAP monomer content limitations in Condition D.1.3 shall be determined by one of the following:

- (a) The manufacturer's certified product data sheet.**
- (b) The manufacturer's material safety data sheet.**
- (c) Sampling and analysis, using any of the following test methods, as applicable:**
  - (1) 40 CFR 60, Method 24, Appendix A (July 1, 1998), shall be used to measure the total volatile HAP and volatile organic compound (VOC) content of resins and gel coats. Method 24 may be modified for measuring the volatile HAP content of resins or gel coat to require that the procedure be performed on uncatalyzed resin or gel coat samples.**
  - (2) 40 CFR 63, Method 311, Appendix A (July 1, 1998), shall be used to measure HAP content in resins and gel coats by direct injection into a gas chromatograph.**
- (d) An alternative method that has been approved by IDEM, OAQ.**

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**~~D.1.5 Particulate Matter (PM)~~**

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~~The dry filters for PM control shall be in operation at all times when the gelcoat application and spray lay up applications are in operation.~~

**D.1.9 Particulate [326 IAC 6-3-2(d)]**

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**Pursuant to 326 IAC 6-3-2(d), particulate emissions from the gelcoat and molding operations shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.**

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**D.1.610 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the stacks (EU12, EU13, and EU14, **E31, E32, E33, and E34**) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.1.711 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through ~~(53)~~ below. Records maintained for (1) through ~~(53)~~ shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC allowable usage level established in Condition D.1.1.
  - (1) The amount and VOC content of each **gelcoat and resin coating material and solvent** used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
  - ~~(2) A log of the month of use;~~
  - ~~(3) The cleanup solvent usage for each month;~~
  - ~~(42) The total VOC usage for each month. (VOC usage for the gelcoats shall be determined by multiplying the gelcoat usage times the VOC content (percent by weight) and times a 30.5 percent flash off factor, and VOC usage for the resins shall be determined by multiplying the resin usage times the VOC content (percent by weight) and times a 11.0 percent flash off factor.); and~~
  - (53) The weight of VOCs emitted for each compliance period.

- (b) To document compliance with Condition D.1.610, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.12 Record Keeping Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]**

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- (a) To document compliance with Condition D.1.3, the Permittee shall maintain records that are complete and sufficient to establish compliance with the HAP monomer content limits. Records maintained shall be taken monthly. Examples of such records include by are not limited to:
  - (1) The usage by weight and monomer content of each resin and gel coat used. Records shall include purchase orders, invoices, and material safety data sheets MSDS), manufacturer's certified product data sheets, and calculations necessary to verify the type, amount used, and HAP content of each resin or gel coat;
  - (2) Method of application and other emission reduction techniques for each resin and gel coat used;
  - (3) Monthly calculations demonstrating compliance on an equivalent emissions mass basis if non-compliant resins or gel coats are used during that month.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain the following records:
  - (1) A copy of the current training program.
  - (2) A list of all current personnel, by name, that are required to be trained and the dates they were trained and the date the most recent refresher training. Records of prior training programs and former personnel are not required to be maintained.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.13 Reporting Requirements**

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A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**D.1.14 Reporting Requirements for Reinforced Plastics Composites Fabrication [326 IAC 20-25]**

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If monthly emissions averaging pursuant to 326 IAC 20-25-3(h)(2) and Condition D.1.3 are used, the Permittee shall submit a quarterly summary report and supporting calculations pursuant to 326 IAC 20-25-7(c).

**SECTION D.2**

**FACILITY OPERATION CONDITIONS**

**Facility Description [326 IAC 2-7-5(15)]**

- (3b) One (1) fiberglass grinding and smoothing operation consisting of various grinders, sanders and saws, with PM emissions controlled by a baghouse exhausting through Stack E15 (formerly E5).
- (4c) Woodworking operations including various saws and routers with PM emissions controlled by a baghouse exhausting through Stack E2 and a movable bag filter.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**D.2.1 Particulate Matter (PM) [326 IAC 6-3] [40 CFR 52, Subpart P]**

Pursuant to ~~326 IAC 6-3 (Process Operations)~~ **40 CFR 52, Subpart P**, the allowable PM **particulate** emission rate from the grinding and smoothing facilities shall not exceed ~~0.57~~ **2.70** pounds per hour when operating at a process weight rate of ~~404.7~~ **1,075** pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**D.2.2 Particulate Matter (PM) [326 IAC 6-3] [40 CFR 52, Subpart P]**

Pursuant to ~~326 IAC 6-3 (Process Operations)~~ **40 CFR 52, Subpart P**, the allowable PM emission rate from the woodworking facilities shall not exceed 1.57 pounds per hour when operating at a process weight rate of 480.0 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
Compliance Branch**

**Part 70 Quarterly Report**

**Source Name:** Harris Kayot, Inc.  
**Source Address:** 2801 West State Boulevard, Fort Wayne, Indiana 46808  
**Mailing Address:** 2801 West State Boulevard, Fort Wayne, Indiana 46808  
**Part 70 Permit No.:** T003-7743-00177  
**Facility:** Gelcoat and molding operations  
**Parameter:** Volatile Organic Compounds (VOC) Emissions  
**Limit:** Twenty-five (25) tons of VOC per twelve (12) consecutive month period, with compliance determined at the end of each month

**YEAR:** \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Months Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## **Conclusion**

The operation of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 003-16250-00177 and Significant Permit Modification No. 003-17105-00177.

**Appendix A: Emissions Calculations**  
**Styrene and Methyl Methacrylate Emissions from**  
**Gel Coat and Molding Operations**  
**(Emission units G17, G18, G19, and G20)**

Page 1 of 4 TSD App A

**Company Name:** Harris Kayot, Inc.  
**Address City IN Zip:** 2801 West State Street, Ft. Wayne, Indiana 46808  
**SSM:** 003-16250  
**Plt ID:** 003-00177  
**Reviewer:** ERG/AAB  
**Date:** 1/10/03

Material	Annual Purchases* (lbs/yr)	Max. Annual Usage** (tons/yr)	HAP wt. %	Emission Factor***	Styrene Tons/yr	Methyl Methacrylate Tons/yr
Poly-Bond B 39 R, S or W, pumpable putty	53500	114.9	24.400%	52.20	3.00	
STYPOL LSPC-3200 Production Resin	534000	1146.5	33.507%	72.50	41.56	
SprayCore 2000-OS 2nd Skin Cote	58300	125.2	40.000%	93.00	5.82	
STYPOL 073-5620 SkinCoat, VE-1 Cook	36200	77.7	34.873%	76.70	2.98	
Polar White, 963WH206 (Gelcote)	83900	180.1	19.362%	172.70	15.55	11.5
	83900	180.1	8.497%	127.50		
Navy, 954LH220 (Gelcote)	5200	11.2	36.474%	366.50	2.05	0.38
	5200	11.2	4.476%	67.50		
Green, 954GH161 (Gelcote)	5300	11.4	36.115%	358.10	2.04	0.38
	5300	11.4	4.435%	67.50		
Yellow, 954YH224 (Gelcote)	1100	2.4	35.292%	342.00	0.40	0.07
	1100	2.4	4.191%	63.00		
Flame Red, 954RH126 (Gelcote)	1200	2.6	36.246%	360.20	0.46	0.08
	1200	2.6	4.325%	64.50		
Pitch, 954BA025LG (Gelcote)	250	0.5	38.181%	402.00	0.11	0.019
	250	0.5	4.822%	72.00		
Pebble (Taupe), 954NA846 (Gelcote)	1200	2.6	36.434%	364.40	0.47	0.09
	1200	2.6	4.548%	67.50		
Orange, 954YH220 (Gelcote)	1200	2.6	35.752%	352.00	0.45	0.09
	1200	2.6	4.378%	66.00		
Cabernet, 954MH030 (Gelcote)	1500	3.2	36.119%	358.10	0.58	0.11
	1500	3.2	4.435%	66.00		
71000, body filler, for lamination	2000	4.3	27.000%	57.80	0.12	

Potential to Emit (tons/year)	75.60	12.7
Total PTE for HAPs (tons/year)	88.3	

Note: Styrene and methyl mathacrylate are also VOCs

\* - Annual Usage based on 2001 usage records and 2040 hours of operation.

\*\* - Maximum annual usage is based on 8760 hours of operation per year.

\*\*\* Emission Factors (in lbs/ton) for resin and gelcoat operations taken from the CFA Unified Emission Factors (July 23, 2001)

**Methodology:**

PTE (tons/yr) for gelcoats and resins = Max. Usage (tons/yr) \* Emission Factor

**Appendix A: Emissions Calculations**  
**VOC and HAP Emissions from the New**  
**Gel Coat and Molding Operations**  
**(Emission units G17, G18, G19, and G20)**

**Company Name: Harris Kayot, Inc.**  
**Address City IN Zip: 2801 West State Street, Ft. Wayne, Indiana 46808**  
**SSM: 003-17105**  
**Plt ID: 003-00177**  
**Reviewer: ERG/AAB**  
**Date: 1/10/03**

<b>Material</b>	<b>Annual Purchases* (lbs/yr)</b>	<b>Max. Annual Usage** (tons/yr)</b>	<b>VOC wt. %</b>	<b>Max. VOC (tons/yr)</b>	<b>MEK (wt %)</b>	<b>MEK (tons/year)</b>
LUPEROX DHD-9, Clear Catalyst	3300	7.1	98.00%	6.9	2.00%	0.14
LUPEROX DHD-9 Red, Catalyst	8900	19.1	98.00%	18.7	2.00%	0.38
PTE VOC (tons/year)				25.7		
Total HAPs (tons/year)						0.52

\* - Annual Usage based on 2001 usage records and 2040 hours of operation.

\*\* - Maximum annual usage is based on 8760 hours of operation per year.

\*\*\* - Styrene and Methyl Methacrylate are also VOCs.

**Methodology:**

PTE (tons/yr) = Max. Usage (tons/yr) \* % weight

**Appendix A: Emission Calculations**  
**Natural Gas Combustion in Four**  
**0.5 MMBtu per hour Space Heaters**

**Company Name: Harris Kayot, Inc.**  
**Address City IN Zip: 2801 West State Street, Ft. Wayne, Indiana 46808**  
**CP: 003-17150**  
**Plt ID: 003-00177**  
**Reviewer: ERG/AAB**  
**Date: 12/09/02**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

2.0

17.5

(includes four 0.5 MMBtu per hour space heaters).

	Pollutant					
	PM*	PM10*	SO2	NO <sub>x</sub>	VOC	CO
Emission Factor in lb/MMCF	7.6	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.07	0.07	0.005	0.9	0.05	0.74

\*PM and PM10 emission factors are for filterable and condensable PM/PM10 combined.

\*\*Emission Factors for NO<sub>x</sub>: Uncontrolled = 100, Low NO<sub>x</sub> Burner = 50, Low NO<sub>x</sub> Burners/Flue gas recirculation = 32

**Methodology**

All Emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF - 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03

(AP-42 Supplement D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See next page for HAPs emissions calculations.

**Appendix A: Emission Calculations**  
**Natural Gas Combustion in Four**  
**0.5 MMBtu per hour Space Heaters**

**Company Name: Harris Kayot, Inc.**  
**Address City IN Zip: 2801 West State Street, Ft. Wayne, Indiana 46808**  
**CP: 003-17105**  
**Plt ID: 003-00177**  
**Reviewer: ERG/AAB**  
**Date: 12/09/02**

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMCF	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.840E-05	1.051E-05	6.570E-04	1.577E-02	2.978E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMCF	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	4.380E-06	9.636E-06	1.226E-05	3.329E-06	1.840E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.